

EXHIBIT B

11/3/2022 Marriott International, Inc. v. Dynasty Marketing Group, LLC et al. Bruno Borra

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

MARRIOTT INTERNATIONAL, INC.,)

Plaintiff,)

v

) Civil Action No.

) 1:21-cv-00610-AJT/JFA

DYNASTY MARKETING GROUP, LLC,)

et al.,)

Defendants.)

)

DEPOSITION OF BRUNO BORRA

APPEARING REMOTELY

November 3, 2022

9:00 a.m.

Reported by: Eileen Mulvenna, CSR/RMR/CRR

DIGITAL EVIDENCE GROUP
1730 M Street, NW, Suite 812
Washington, D.C. 20036
(202) 232-0646

1 BRUNO BORRA,

2 having been duly sworn by Eileen Mulvenna,

3 a Notary Public of the State of New York,

4 was examined and testified as follows:

5 EXAMINATION

6 BY MR. BARNES:

7 Q. Good morning, Mr. Borra. As you
8 heard, my name is Attison Barnes. I represent
9 Marriott in this case.

10 Could you spell your full name,
11 please.

12 A. It's Bruno Borra; B-R-U-N-O,
13 B-O-R-R-A.

14 Q. And what's your residence address?

15 A. [REDACTED],
16 [REDACTED].

17 Q. And do you understand that your
18 deposition is being taken in a case filed by
19 Marriott against your company?

20 A. Yes, sir.

21 Q. Did you receive a notice of deposition
22 in this case for you to appear today?

1 A. Yeah.

2 Q. What did you do to prepare for your
3 testimony today on those 20 topics?

4 A. On the -- well, they're pretty simple
5 answers. I don't know what you want me to prepare
6 for.

7 Q. Okay. Did you do any preparation for
8 your testimony today other than look at the topics?

9 A. No, because I know how to answer them.

10 Q. Did you review any documents in
11 preparation for your testimony on those areas?

12 A. Just the answers I sent to Mr. Griffin
13 that he wanted me to answer.

14 Q. Did you have any discussions with
15 anyone other than your counsel to prepare for the
16 deposition on those areas of inquiry?

17 A. No.

18 Q. Have you been deposed before,
19 Mr. Borra?

20 A. No.

21 Q. So you may have had a discussion with
22 your counsel, but I just want to make sure we're on

1 included. Calypso Cay. And then, little by little
2 I started losing contracts because of this.

3 Q. What about AMResorts?

4 A. Yes, them, too.

5 Q. Any other ones?

6 A. That I can recall, not off the top of
7 my head, no.

8 Q. And you had similar relationships with
9 each of them?

10 A. Yeah, it's the same thing, just send
11 them customers that qualify for the tour.

12 Q. You haven't produced any of the
13 contracts with those entities. Did you know that
14 Marriott asked for you to produce those contracts?

15 A. Yes, but I didn't want to get my
16 contracts canceled. If I get them canceled, they
17 don't have to fulfill my packages.

18 Q. You understand that you were asked to
19 provide that in the discovery, though?

20 A. Yeah, I know.

21 Q. And the only document you produced
22 with respect to TAFER was a one-page sheet from

1 A. I just took a picture, and then -- the
2 app, you take a picture, and then you send it to
3 them you.

4 Q. All right. You send it to them over
5 an app?

6 A. Yes.

7 Q. And did you go back and look at
8 whether you could -- you could find that
9 communication over the app?

10 A. No. It's been more than a year.

11 Q. But you didn't look for it?

12 A. No, I'm pretty sure it's gone, too,
13 because everything deletes after more than a year.

14 Q. But, again, you didn't look for it?

15 A. No.

16 Q. And then did you know the person who
17 actually recorded it?

18 A. No.

19 Q. Did you receive a recording back?

20 A. Yeah, it's the one that I implemented
21 in the dialer.

22 Q. And where is that -- how did you get

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1 Q. So you still have that document and
2 you haven't produced it -- or that recording?

3 A. I believe I have it. I'm not sure.

4 Q. All right. But you didn't look before
5 you were responding to the discovery whether you had
6 it or not; right?

7 A. No, because you guys already have the
8 script to the transcript already.

9 Q. All right. You have the recording.
10 Okay.

11 A. I'm not sure I have the recording, no.

12 Q. All right. Well, I think you said you
13 still have that laptop.

14 So you -- you had this recording. Who
15 did you give it to once you had the recording on
16 your laptop?

17 A. I uploaded to the dialer. That's it.

18 Q. And who did you upload it to?

19 A. Whitetail.

20 Q. Whitetail?

21 A. Yeah, the dialer company.

22 Q. And where is Whitetail?

1 January of 2021 with Whitetail?

2 A. Yeah.

3 Q. All right. You haven't produced that
4 document; correct?

5 A. I don't have that document anymore.

6 Q. Did you look for it?

7 A. No, because I know I don't have it.

8 Q. Why would you know you don't have it?

9 A. Because I delete all those e-mails.
10 It's just an e-mail you send by Adobe and sign it.

11 Q. But you haven't looked for it?

12 A. Because I'm not going to look for them
13 if I don't have them, and I know I don't have them.

14 Q. And in the contract with Whitetail,
15 what were you asking them to do?

16 A. Same thing as this company, just use
17 the predictive dialer.

18 Q. And it was through this company
19 Whitetail that you uploaded the voice recording
20 mentioning Marriott?

21 A. Yeah.

22 Q. And approximately how many -- did you

1 upload it once? So you used the same message the
2 whole time?

3 A. Yeah, I believe -- or there was two
4 versions, one for, like, the summer and then one for
5 the winter, I believe.

6 Q. Right. One was a 4th of July message;
7 right?

8 A. Yeah, that one. That's the summer
9 one.

10 Q. What was the winter one?

11 A. I guess over the holidays, I believe,
12 or...

13 Q. And both of them mentioned Marriott;
14 right?

15 A. I don't -- I don't remember. I know
16 one of them mentioned -- I think the 4th of July one
17 mentioned Marriott for sure, but I don't know about
18 the other one.

19 Q. And let's talk first about the 4th of
20 July message. Approximately how many calls were
21 made using the 4th of July message with Marriott in
22 it?

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1 A. I have no idea.

2 Q. Did you ever -- what's that?

3 A. I just dropped the voice message, and
4 the software itself drops it automatically
5 [inaudible] how much is dropped.

6 Q. Yeah, did you know that it was more
7 than a million calls?

8 A. No.

9 Q. Did you know it was more than 500,000
10 calls?

11 MR. ADAMS: Object to the form of the
12 question.

13 THE WITNESS: I assume it's probably
14 more than hundred K. That's for sure.

15 BY MR. BARNES:

16 Q. All right. But you don't know, and
17 you haven't looked into that?

18 A. No, I don't know the exact number.
19 That's something only the dialer company would know.
20 They keep records of that.

21 Q. And for responding to the discovery,
22 you didn't look into how many calls were made using

1 document that was produced by VoIP Essential. You
2 didn't produce it, although it's responsive to
3 discovery in this case. And I'd like to go through
4 it because it refers to your relationship with VoIP
5 Essential and communications that were going back
6 and forth. So let's start with the
7 last page, which was the first page of the
8 conversation.

9 And I'm going to ask Dan to pull up
10 the bottom and blow that up to make it look a little
11 bigger.

12 So at the bottom of the page, under
13 the words where it says "confidential," this is
14 Friday, August 27, 2021. Do you see that?

15 A. Uh-huh.

16 Q. And this is from -- this e-mail is
17 from Dynasty Marketing.

18 A. Yeah.

19 Q. And would you have been -- would you
20 have had access to these e-mails?

21 A. To that e-mail, yeah. I'm pretty sure
22 I can look for it.

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1 Q. Okay. But you hadn't looked for it
2 yet in order to respond to discovery; right?

3 A. The thing is all the questions you
4 guys are asking for, you guys got to be more
5 specific. I don't know what documents you guys are
6 looking for. I'm just giving you what I know.

7 Q. All right.

8 A. If you would have asked the question,
9 Please provide all the contact with the VoIP
10 Essential, I would have looked for it. You didn't
11 ask those questions.

12 Q. So we'll go through that, in terms of
13 the request that we asked. But let's get to this
14 e-mail, which --

15 MR. BARNES: Dan, what's our number on
16 this one?

17 THE VIDEOGRAPHER: This is Exhibit 9.

18 MR. BARNES: Exhibit 9. So we'll mark
19 this as Exhibit 9.

20 (Exhibit 9, Bates Nos.

21 VE_MA_000176-184, Dynasty Marketing Group

22 Posts, received and marked.)

1 information on the status of calls, calls not
2 called, dialable, penetration. This is all
3 information you had access to while the calls were
4 being made; right?

5 A. At the moment, yes, I have access to
6 that.

7 Q. All right. And you had access to this
8 e-mail, as well, in your system when you were
9 responding to the discovery in this case?

10 A. Well, if you would have asked the
11 correct question, yes, I would have provided it.

12 Q. Did you look for any communications
13 about the calls that were made during the period of
14 time of the lawsuit?

15 A. No, because I didn't have that dialer
16 no more.

17 Q. So let's look at the -- let's look at
18 the top, the second -- the September 7, 2:08 p.m.
19 e-mail. And this is an e-mail from your company
20 where it says, "Yea but how would I be able to do
21 that to other lists that I have."

22 What do you mean "other lists that I

1 September 20 of 2021; correct?

2 A. Yes.

3 Q. So within the last -- well, a little
4 over a year ago you had access to this information;
5 correct?

6 A. Yes.

7 Q. Did you do anything to search for
8 these types of metrics when you were responding to
9 the discovery in this case?

10 A. I wasn't aware I got to provide
11 regarding VoIP Essential.

12 Q. And do you still have this information
13 in your possession, what -- your communications with
14 VoIP Essential?

15 A. The e-mail, yeah. I believe so, yeah.

16 Q. And do you realize that VoIP Essential
17 was a defendant in this case, one of the group
18 entities that had been sued along with Dynasty
19 Marketing Group?

20 A. Yeah.

21 Q. And you didn't provide any -- your
22 communications with VoIP Essential in this case;

1 referring to Marriott?

2 A. No.

3 Q. Did you ever ask anyone at VoIP
4 Essential and/or Whitetail how many voicemails
5 mentioning Marriott were dropped between February of
6 2021 and January of 2022?

7 A. No.

8 Q. And after you received the complaint
9 in this case where Marriott's concern was how many
10 calls question made, did you do any investigation
11 into finding that out, how many times a call was
12 made using a voicemail that mentioned Marriott?

13 A. Well, it did not mention Marriott
14 only. It mentioned Hilton, too. But, no, it was
15 just a software. It's a system that works by
16 itself.

17 Q. And did you not, during the period of
18 time that you were running the voicemail have access
19 to the metrics to show how many times that voicemail
20 was dropped?

21 A. Those reports were always incorrect.
22 As you can see -- I know you have a conversation

1 with me and Sean. He will say that some of them are
2 incorrect. Some of them are correct. I don't
3 believe those voicemails were dropped that much on
4 the particular days. I don't think it had the same
5 accuracy as Whitetail. I think the VICIdial dialer
6 system was -- or VoIP Essential was not as
7 competitive as the Whitetail one.

8 Q. Mr. Borra, after you received
9 Deposition Exhibit No. 2, which was the topics for
10 your corporate designee deposition today, did you do
11 anything to determine the number of calls that were
12 made using Marriott's name?

13 A. No, because I don't have access to
14 those portal admin log-ins no more.

15 Q. Did you -- did you seek that
16 information from either Whitetail or VoIP Essential?

17 A. No, because I was not made aware that
18 I had to look for those records.

19 Q. Did you understand that -- did you
20 understand that for a 30(b)(6) deposition, that you
21 would need to get educated on the areas of inquiry
22 those 20 items that we mentioned earlier?

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1 A. Yeah, but I still didn't understand it
2 because I was not able -- I did not have access to
3 those documents of Whitetail or VICI or whatever
4 it's called software reports. Because they make a
5 report, a website, and after your account is done,
6 they delete it.

7 Q. Did you call either Whitetail or VoIP
8 Essential to determine whether or not they, in fact,
9 still had those records?

10 A. No. Because I believe in the contract
11 itself, it says after -- after you end your services
12 or they end your services, everything gets deleted.

13 Q. But you didn't call them to find that
14 out; right?

15 A. No.

16 THE WITNESS: I'll be right back. I'm
17 going to get my charger. My phone is about
18 to die.

19 MR. BARNES: Let's take a five-minute
20 break so you can get your charger.

21 THE VIDEOGRAPHER: Okay. The time is
22 11:36 a.m., and we're going off the record.

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1 than that; right?

2 A. Yeah, I went to 2 percent. That's why
3 they cut me off.

4 Q. But you actually went to 5.5 percent,
5 which is --

6 A. No, that's for the one right now. The
7 one I'm current right now is 5.8 percent.

8 Q. Oh, I'm talking about the -- do you
9 recall what level of chargebacks you went to in --
10 for 2021?

11 A. Well, for PayPal alone, it was
12 2 percent. And that's when they cut me off. For
13 this, I don't know. I'll say probably around 5.
14 I've been averaging 5 percent, like, a month.

15 Q. And do you know what the industry
16 standard for chargebacks is?

17 A. Probably 1 percent, I believe.

18 MR. ADAMS: I'll object to the form of
19 the question.

20 BY MR. BARNES:

21 Q. And if I were to ask you how many
22 chargebacks there were between February of 2021 and

1 June of 2021, would you be able to tell me?

2 A. Off the top of my head, no.

3 Q. And you wouldn't be able to tell me
4 what the reasons for each one of those chargebacks
5 was; right?

6 A. No. Basically, buyer remorse. They
7 just change their mind.

8 Q. So did you also -- the next document
9 after this spreadsheet, it has a title "Pending
10 Reservations."

11 A. Yes, that was my -- one of my customer
12 service agents who does our Excel sheet.

13 Q. Okay. Who -- we're looking at that on
14 the screen. So it's labeled in your responses as
15 Exhibit 2j; is that right? You see at the bottom of
16 the page on the right?

17 A. Uh-huh.

18 Q. So who in your office would have
19 created this document?

20 A. One of my customer service agents that
21 doesn't work with me no more.

22 Q. Who was that?

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1 THE REPORTER: There was cross talk.

2 BY MR. BARNES:

3 Q. Is that right, Mr. Borra? You said
4 yes?

5 A. Yes, there was confirmations.

6 Q. And for what resorts would there be
7 confirmations during this period of time,
8 February 2021 through, let's say, January of 2022?

9 A. It depends on the resort that the
10 customer chose.

11 Q. And so tell me the typical line of
12 communication. You would send them an e-mail that
13 says, I have a customer that wants to book a room,
14 and they would respond back?

15 A. No, they fill out their booking form
16 on the website. I get the e-mail. I call -- or we
17 call the customer to confirm everything is correct.
18 We send it to the resort to verify they qualify.
19 And if they don't qualify, we tell them that
20 property you cannot take a tour. Is there another
21 property you would like to take a tour to, and we
22 just look for something to offer them, the

1 qualifications.

2 Q. And so as a result of those
3 confirmations, a number of consumers stayed at the
4 various resorts; right?

5 A. Yeah.

6 Q. Do you know in that time period,
7 February of 2021 to January of 2022, how many
8 consumers you placed at the various resorts?

9 A. No, I don't have exact number off the
10 top of my head. No.

11 Q. Did you understand that the deposition
12 notice asked you to be prepared to talk about the
13 bookings?

14 A. The thing is that we're a small
15 company. We're not trying to keep track where
16 everything is [inaudible]. We send you the
17 reservation form. We call you confirming. We send
18 it to the resort. They tell you if you got a
19 confirmation or not. It's as simple as that. We
20 don't try to do it hard.

21 Q. But you understand that you were asked
22 to be prepared to talk about the bookings?

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1 waiting for the customer to send their ID. It's
2 just a checklist, basically. Once it gets done, you
3 know, we mark it, Okay. This is done. This is a
4 checklist.

5 Q. And the two documents that you -- the
6 one before and this one, are these the only
7 reservation documents that you have?

8 A. Yeah. You just keep it as simple as
9 possible, yes.

10 Q. Okay. So we don't have all the
11 confirmation e-mails that you would have sent back
12 and forth with the resorts. All you have are these
13 two documents for the --

14 A. Yes. Like I said, if I was to go one
15 by one, it would be thousands of pages of e-mails,
16 right.

17 Q. Let's then go to the next document
18 that you produced. What is this document? It
19 appears to be --

20 A. That's what --

21 Q. -- a customer ID and customer
22 information?

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1 A. Yeah, that's what I send the customer
2 who wants to make a purchase with us for them to
3 have an invoice, you know. The paper trail,
4 basically.

5 Q. All right. So you would have this
6 type of customer information with a package of what
7 they purchased for each customer that bought during
8 the period of time, February of 2021 to January of
9 2022?

10 A. Yes [inaudible].

11 Q. But you haven't produced those in
12 response to discovery; right? You just produced
13 this one which doesn't have any names or address or
14 phone numbers?

15 A. I mean, I don't have permission to
16 share every person's information.

17 Q. Well, do you know -- do you have an
18 understanding that we have a protective order in
19 this case for confidentiality?

20 A. No, I didn't know that.

21 Q. All right. But you just decided not
22 to produce the individual reservations for the

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1 was chargeback against the income that you would
2 have received for the telemarketing?

3 A. Yeah. And, also, PayPal kept money,
4 too, just in case of future chargebacks.

5 Q. And of the amount that you received
6 from both Maverick and PayPal, do you have a
7 calculation of the money that you actually -- the
8 profit that you actually took home?

9 A. From, like, everything in general?

10 Q. For this period of time, yeah, with
11 both Maverick and PayPal.

12 A. Well, 60 percent goes to employees.
13 And then 20 --

14 Q. But, again -- let's say how much comes
15 to Dynasty first.

16 A. After, let's say, take out 5 percent
17 from those 300K, all that comes to Dynasty after
18 that. But then I have to distribute between
19 employees and bills.

20 Q. And have you done a calculation of
21 what your profit was?

22 A. Like me personally or the company?

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1 Q. The company.

2 A. No more than 10 percent or 5. Between
3 5 and 10 percent.

4 Q. But you haven't done a calculation of
5 that?

6 A. No.

7 Q. We talked a little bit earlier about
8 TAFER Resorts?

9 A. Yeah.

10 Q. Which individuals did you work with at
11 TAFER?

12 A. I don't -- I don't remember. I just
13 sent an e-mail to see if I can reserve fulfillment.
14 There's not one particular division. They just send
15 a response, like yes or no.

16 Q. So you're not aware of any individuals
17 that you would have worked with at TAFER?

18 A. No.

19 MR. BARNES: So let me show you

20 Tab 91. I believe this will be No. 27.

21 Is that right, Dan?

22 THE VIDEOGRAPHER: That's correct.

1 works, but different division replies. That's all I
2 know.

3 Q. Okay. In this document -- and we
4 can -- let's go to page 2. There are various PDFs
5 that are referenced. For example, there's a TAFER
6 group request at the top of the second page.
7 There's a TAFER group request a little bit below
8 that. There are, on the next page, broker contact
9 information. On the next page, there are broker
10 rates for additional 2021, reservation and
11 verification process, reservation format.

12 None of those documents, Mr. Borra,
13 have been produced to us even though they appear to
14 have been attached to this e-mail chain that you
15 provided.

16 Is there any reason why those
17 documents weren't produced?

18 A. I wasn't aware that they had to be
19 produced. Those are just, like, qualifications and
20 rates for particular holidays and stuff.

21 Q. It relates to your contractual
22 relationship with TAFER; correct?

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1 Q. And for TAFER or for Vallarta Gardens,
2 and for none of these resorts have you provided the
3 confirmation documents in discovery?

4 A. No, I was unaware of that.

5 Q. And you still have those; right?

6 A. Yeah. For every individual that have
7 been there, yeah.

8 Q. And would that apply also to AMResorts
9 and to West Gate and the others that you mentioned
10 earlier including Luxor?

11 A. Yes.

12 Q. You mentioned earlier a company called
13 Calypso Cay Resort?

14 A. Yes.

15 Q. What is Calypso Cay Resort?

16 A. It's a resort by Disney. You have to
17 take a presentation tour to get to.

18 Q. Do you know who owns Calypso Cay
19 Resort?

20 A. No. I know who worked there, but I
21 don't know who owns it.

22 Q. Well, who do you know who worked

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1 there?

2 A. My ex-sister-in-law works there.

3 Q. Okay. And so what's her name?

4 A. Vanessa Ramirez.

5 Q. And does Vanessa live in Orlando?

6 A. Yes.

7 Q. Do you know Vanessa's address?

8 A. No.

9 Q. And do you know whether Calypso Cay
10 has a call center?

11 A. Yes.

12 Q. And how do you know that?

13 A. Like in this industry, you just know.
14 Since I'm in Orlando, you know.

15 Q. I'm sorry?

16 A. Since I'm in the industry, you know
17 who's doing what at all the other call centers.

18 Q. And do you know whether Calypso Cay is
19 involved in marketing using Marriott's name?

20 A. In a way, yeah.

21 Q. And how do you know that?

22 A. Because I seen it, what I heard.

1 Q. And what have you -- what have you
2 seen first?

3 A. I don't feel comfortable talking about
4 it on recording.

5 Q. Why not?

6 A. I just -- I just don't. I'm
7 authorized to talk about it, but not on the record.

8 Q. And do you know those -- the call
9 centers have contracts with TAFER?

10 A. Yeah.

11 Q. Which one, Calypso Cay?

12 A. Well, it's not Calypso Cay. Like it's
13 just a person that works in Calypso Cay high rank
14 that has his own call center that brings customers
15 into Calypso Cay.

16 Q. And who is that?

17 A. I'd rather talk about this, like, off
18 the record, not, like, on the record.

19 Q. And, again, why is that?

20 A. Just for my safety.

21 Q. Because you're fearful for your safety
22 if you disclose certain information?

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1 A. Yes.

2 Q. Have you been threatened?

3 A. No, but I just know these particular
4 people.

5 Q. Okay. And what is the -- so what --
6 what contracts do you know that these people have
7 with TAFER?

8 A. The same, the same as what I had. You
9 know, just send people that qualify, yeah.

10 Q. So, again, for Calypso Cay, what have
11 you seen that would make you think they're using
12 Marriott's name?

13 A. I know who they're calling.

14 Q. You know who they're calling? And
15 just give me -- like who are they calling?

16 A. I can say this off the record. I
17 don't want -- I'd rather discuss this off the
18 record, not on the record.

19 Q. Are you -- are they calling -- well, I
20 guess they're using -- they're using Marriott's
21 name. So they're -- they're calling -- are they
22 calling Marriott customers?

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1 A. I don't want to discuss this on the
2 record.

3 Q. Other than Calypso Cay Resort --

4 MR. BARNES: And, Phillip, we may need
5 to talk about this if he's not going to
6 answer the questions. And we may need to
7 raise it with the Court.

8 BY MR. BARNES:

9 Q. But other than Calypso Cay, are you
10 aware of other entities using Marriott's name?

11 A. Like other call centers, yeah, but not
12 like entities.

13 Q. Okay. What other call centers are
14 using Marriott's name?

15 A. I'd rather talk about this, like, off
16 the record.

17 Q. And do those call centers also have
18 contracts with TAFER, to your knowledge?

19 A. I believe so, yeah.

20 Q. And do they also have contracts with
21 Vallarta Gardens?

22 A. I believe so.